

October 19, 2018

**Joint Letter – Post Discovery Conference**  
**Seidman v. Gax Productions LLC**  
**Docket No.1:18-cv-2048**

The Honorable Barbara Moses  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Dear Judge Moses:

This Joint Letter is written in accordance with Judge Abrams' Case Management Plan and Scheduling Order, dated May 18, 2018.

The status of the case is as follows:

1. The parties have engaged in settlement negotiations. No agreement has been reached. The parties request that the Court schedule a Settlement Conference before engaging in motion practice.
2. Both parties intend to file motions for summary judgement. The Plaintiff based on copyright infringement liability, and the Defendant based on Fair Use.

Sincerely,

*Richard Liebowitz*

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Richard Liebowitz, Esq.  
Counsel for Plaintiff

*Laurence Singer*

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Laurence Singer, Esq.  
Counsel for Defendant